

**Remarks/Arguments**

Claims 1-6 and 8-148 are pending. Claims 1, 2, 6, 8, 11-13, 30, 119-121 and 137-141 are amended. Claims 7, 14-29, 124-136 and 144-148 are canceled. Claims 44-118 are withdrawn. No new matter has been added to the specification.

**1. Teleconference Summary.**

Applicant wishes to thank the Examiner and the Examiner's Supervisor for the interview conducted by teleconference on May 2, 2006. Present during the teleconference were the undersigned and Steven C. Lieske, Applicant's attorneys. Prior to the teleconference, Applicant's attorneys provided Examiner with a copy of Memorandum in Further Support of Applicant Initiated Interview Request, which included a table detailing Applicants' claim language for claim 1, Examiner's rejection of each limitation of claim 1 as stated in the Office Action dated March 6, 2006, and Applicant's responses refuting Examiner's rejections.

During the teleconference, the rejected independent claims namely, 1 and 30, were discussed. With regard to claim 1 Applicant specifically noted that the art of record, U.S. Pat. No. 6,374,252 to Althoff et al. (hereafter "Althoff"), did not disclose a "Meta Knowledge Model" designed to extend an object oriented programming language to represent knowledge without an object or relational database. In addition, Althoff did not disclose a "Meta Logic Model" that enables new knowledge to be derived.

Examiner and Examiner's Supervisor stated that, while Applicant's claims include well defined elements, claims 1 and 30 do not provide sufficient detail regarding activities performed by these elements. Accordingly, Examiner and Examiner's Supervisor requested that Applicant amend claims 1 and 30 to include details about how knowledge is fed into

models recited in those claims and the results thereof. These requests are addressed in the claim amendments and remarks herein.

## **2. Power of Attorney**

A Revocation and Power of Attorney, including a Statement under 37 CFR 3.73(b) and a copy of the assignment, were submitted to the U.S. Patent Office on November 3, 2005. PAIR confirms receipt of the documentation on November 3, 2005; however, communications continue to be provided to prior counsel.

A copy of the previously-filed Revocation and Power of Attorney are enclosed for your convenience. Please process this document at your earliest convenience so that all future communications are properly mailed to the undersigned.

## **3. Election Requirement**

Applicant elected, without traverse, Group I, Claims 1-43, and withdrew Group II, Claims 44-60; Group III, Claims 61-79; and Group IV, Claims 80-118 in a response to office action filed with the USPTO on May 16, 2005. Examiner acknowledged Applicant's election in section 9 of the final office action dated March 6, 2006. Accordingly, Applicant does not herein further address sections 4-8 of the final office action dated March 6, 2006.

## **4. Claim Objections**

Claims 124, 129, and 136 were objected to under 37 CFR 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. Claims 124, 129 and 136 are canceled rendering this objection moot.

#### **5. §101 Claim Rejections**

Claims 15-29 and 124-135 were rejected under 35 U.S.C. § 101. Claims 15-29 and 124-135 are canceled thereby obviating this rejection.

#### **6. §112 Claim Rejections**

Claims 15-29 and 124-135 were rejected under 35 U.S.C. § 112, ¶ 2, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as his invention. Again, claims 15-29 and 124-135 are cancelled herein. Accordingly, this rejection is now moot.

#### **7. § 102(e) Claim Rejections**

Claims 1-6, 8-43 and 119-148 were rejected under 35 U.S.C. § 102(e) as being anticipated by Althoff. Applicant traverses the rejection and requests reconsideration.

Althoff fails to disclose, teach or suggest Applicant's invention as now claimed. Specifically, Althoff fails to disclose, teach or suggest a "computer program comprising: a code segment for storing in a human readable format a set of logic details for the knowledge-oriented software application; a code segment for storing a set of relation functions for deriving new relations from a set of base relations and imposing rules and constraints on the relations, wherein the new relations comprise the relation functions providing code that accepts a predetermined number of base relations as input and returns derived knowledge as data represented as a relation . . . ."

Althoff is directed to a method and system for modeling, storing and querying objects in relational databases, where queries are expressed in Structured Query Language (SQL). See Abstract; col. 3, lines 12-25. Althoff expressly requires a relational database. See Althoff, col. 3, ll. 12-16 ("...modeling of object-oriented database structures, translation

to relational database structures"). Furthermore, in column 10, Althoff merely teaches how the meta-model (made up of classes, class properties, and relationships between the classes) can represent an object database. Althoff fails to teach or suggest deriving "new knowledge" as now claimed in Applicant's invention. For example, Althoff does not explicitly teach what object operators are used in composing queries. Rather, Althoff discloses "generat[ing] SQL commands using the form shown in table 9-3." With this, Althoff only provides a method of translating and delegating the SQL queries to an underlying database. An SQL query engine provides a fixed list of operation, so called relational operators, as listed in Althoff Table 9-3. SQL queries and SQL Engines are fundamentally different than Applicant's "code segment for storing a set of relation functions for deriving new relations from a set of base relations and imposing rules and constraints on the relations . . . [to] return derived knowledge as data represented as a relation." Accordingly, Applicants' claimed invention is not anticipated by Althoff.

Based on the foregoing, pending independent claims 1 and 30 are not anticipated by Althoff. Accordingly, the claims depending from these independent are not anticipated by Althoff. Thus, Applicant respectfully requests reconsideration and allowance of claims 1-6, 8-13, 30-43, 119-123 and 137-143.

#### **Conclusion**

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at 612-607-7345. Applicants request an extension of time to respond to the present office action of one-month, the three-month statutory period having expired on June 6, 2006 and this response being filed on June 14, 2006. Accordingly, Applicant authorizes the Commissioner to charge a three month extension fee to Deposit Account No. 50-1901 (Reference No. 22674-3001). If any

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additional fees are necessary, the Commissioner is also authorized to charge or credit any such fees or overpayment to the aforementioned Deposit Account.

Respectfully submitted,



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